UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA CRIMINAL NO. 12-074 (MJD/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

(18 U.S.C. § 1151)

(18 U.S.C. § 1153(a))

V.

(18 U.S.C. § 2241(c))

(18 U.S.C. § 2244(a) (5)

DEAN EARL WILKENS,

(18 U.S.C. § 2246(2) (A))

(18 U.S.C. § 2246(2) (B))

Defendant.

(18 U.S.C. § 2246(2) (C))

(18 U.S.C. § 2246(3)

THE UNITED STATES GRAND JURY CHARGES THAT:

#### COUNT 1

(Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

## DEAN EARL WILKENS,

an Indian, did knowingly engage in a sexual act with Jane Doe #1, also an Indian and a child under the age of twelve years, to wit: contact between the mouth and the penis, the mouth and the vulva, and the mouth and the anus, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(c), 2246(2)(B), and 2246(2)(C).

# COUNT 2 (Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

#### DEAN EARL WILKENS,

an Indian, did knowingly engage in a sexual act with Jane Doe #1,

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U.S. DISTRICT COURT MPLS

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also an Indian and a child under the age of twelve years, to wit: the penetration, however slight, of the anal and genital opening of Jane Doe by a hand and finger and by any object, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of the defendant, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(c), 2246(2)(B), and 2246(2)(C).

#### COUNT 3

(Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

## DEAN EARL WILKENS,

an Indian, did knowingly engage in a sexual act with Jane Doe #1, also an Indian and a child under the age of twelve years, to wit: contact between the penis and vulva, contact with the penis occurs upon penetration however slight, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(a)(1), 2246(2)(A).

#### COUNT 4

(Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

## DEAN EARL WILKENS,

an Indian, did knowingly engage in a sexual act with Jane Doe #2,

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also an Indian and a child under the age of twelve years, to wit: the penetration, however slight, of the anal and genital opening of Jane Doe #2 by a hand and finger and by any object, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of the defendant, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(c), 2246(2)(B), and 2246(2)(C).

#### COUNT 5

(Abusive Sexual Contact)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

## DEAN EARL WILKENS,

an Indian, did knowingly engage in a sexual contact with Jane Doe #3, also an Indian and a child under the age of twelve years, to wit: the intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh and buttocks of any person with an intent to abuse, humiliate, harass, degrade, and arouse or gratify the sexual desire of the defendant, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2244(a)(5), and 2246(3).

A TRUE BILL

FOREPERSON